

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

VS.

Crim. No. 04-30046-MAP

ALBERT INNARELLI, ET AL,  
DEFENDANTS

**MOTION OF DEFENDANT MICHAEL BERGDOLL  
TO MODIFY CONDITIONS OF RELEASE**

Now comes the defendant Michael Bergdoll and moves that the conditions of his presentencing release restricting his travel to the Commonwealth of Massachusetts and the State of Connecticut be modified.

The defendant seeks permission to travel to New York City with his wife Judith Bergdoll for a vacation from Friday June 9, 2006 until Sunday evening June 11, 2006. Mr. Bergdoll and his wife will be staying at the Le Parker Meridien Hotel, 118 West 57<sup>th</sup> Street, New York, New York 10019. The telephone number for the hotel is 212-245-5000.

Counsel for the defendant has conferred with counsel for the government and the government does not oppose the allowance of this motion.

Wherefore the defendant respectfully requests that the within motion be allowed.

The Defendant  
Michael Bergdoll  
By his attorney

/s/ Steven W. Leary  
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CERTIFICATE OF SERVICE

I, Steven W. Leary, Esquire, counsel of record, hereby certify that I made service of the foregoing document by electronic filing, to all attorneys of record.

June 6, 2006

/s/ Steven W. Leary, Esq  
Steven W. Leary, Esq.

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